

JEROME JUNIOR WASHINGTON  
Plaintiff  
V.  
C.O. J. JONES; et. al;  
DEFENDANTS

RECEIVED  
MAR 10 2018  
CLERK, U.S. DISTRICT COURT  
WEST DIST. OF PENNSYLVANIA

PRISONERS COMPLAINT FORM  
42 U.S.C. § 1983 AND 28 U.S.C. § 1331 (a)  
TO OBTAIN RELIEF FROM VIOLATION OF  
FEDERAL LAWS BY DEMANDED FOR  
JURY TRIAL JURISDICTION.

INTRODUCTION:  
1. JURISDICTION OF COMPLAINT  
Plaintiff JEROME JUNIOR WASHINGTON is hereby PRO-SE LITIGANT FOR THE UNITED STATES WESTERN DISTRICT OF PENNSYLVANIA AS FOLLOW FOR THE DECLARED PRISONERS COMPLAINT UNDER PENALTY OF PERJURY. PURSUANT UNDER THE UNITED STATES WESTERN DISTRICT 42 U.S.C. § 1983 AND 28 U.S.C. § 1331 (a) TO OBTAIN RELIEF FROM VIOLATIONS OF FEDERAL LAWS. TO THE VIOLATIONS OF PLAINTIFF 8th AND 14th AMENDMENT RIGHTS. TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT PLAINTIFF CONSTITUTIONAL LAWS OF PRISONERS RIGHTS. TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT BY PRISON OFFICIALS OR PRISONERS ASSAULTS AND VIOLENCE UPON MENTALLY PHYSICALLY AND EMOTIONALLY HARM DAMAGES AND PAIN AND SUFFERING. WHY? THE PLAINTIFF STRUGGLE THROUGH THE ATTRIBUTIVE HARSHNESS OF SCI-GREENE SRTU GB PROGRAM OVERSEEN BY THE CUSTODY SAFETY AND CONTROL SUPERVISORY NO OTHER THAN OVERALL SUPERINTENDENT/WARDEN ~~SMITH~~ GILMORE IS THE OVERALL PROTECTOR DEFEND SAFETY AND CUSTODY CARE OF PRISONERS AND PRISON OFFICIAL TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT C.O. J. JONES FALSEIFIED MISCONDUCT AND IRRATIONALLY PARTICIPATING HEREIN ON 3/28/18 AROUND 3:30pm ASSAULTIVE AND BATTERY EXISTED BY EXCESSIVE FORCE "(DC-ADM001)" POLICY. VIOLATION.

2. PLAINTIFF JEROME JUNIOR WASHINGTON WAS CONFINED AT SCI-GREENE SRTU PROGRAM ON GB UNIT AS AN MENTAL HEALTH SMI/ED D-ROSTER PATIENT OR PRISONER HEREIN PETTSBURGH JAIL UNDER A STATE CORRECTIONAL INSTITUTIONS LOCATED AT SCI-GREENE/175 PROGRESS DRIVE/ WAYNESBURG PA 15370 UPON THE DEFENDANTS CONSTITUTIONAL VIOLATIONS OF LAWS TO THE 6th AND 14th AMENDMENT IS RIGHTS

3. PLAINTIFF JEROME JUNIOR WASHINGTON IS AND WAS AT ALL TIMES MENTIONED HEREIN AN ADULT CITIZEN OF THE UNITED STATES AND A RESIDENT OF THE STATE OF PETTSBURGH, PENNSYLVANIA

4. DEFENDANT: SUPERINTENDENT MR. GILMORE WAS AT ALL TIMES HEREIN SUPERINTENDENT/WARDEN OF SCI-GREENE SRTU PROGRAM. AS THE WARDEN OF THE MUNICIPAL PRISON. FOR THE CITY OF PETTSBURGH AND THE STATE OF PENNSYLVANIA DEFENDANT GILMORE MANAGES ITS DAY TO DAY OPERATION AND EXECUTES THE PRISON CORPORATION OF POLICES PRACTICES AND PROCEDURES AT ALL RELEVANT TIMES MENTION HEREIN PLAINTIFF SRTU-GB PROGRAM COMPLAINT.

5. DEFENDANT: C.O. J. JONES WAS AT ALL RELEVANT TIMES HEREIN AN EMPLOYEE/GUARD OF THE PRISON OF SCI-GREENE SRTU GB UNIT MENTAL HEALTH PROGRAM AS AN PRISON OFFICIAL CORRECTIONAL OFFICER WORKING ON 2 TO 10 SHIFT ON 3/28/17 TO COMMIT THE VIOLATION TO PLAINTIFF 8th AND 14th AMENDMENTS RIGHTS TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT.

6. AS EMPLOYEE'S HEREIN EMPLOYMENT JOB ASSIGNMENT IS PRISON GUARDS AND WARDEN AT SCI-GREENE 175 PROGRESS DRIVE/ WAYNESBURG PA 15370 AS THE ABOVE NAMED DEFENDANTS

7. DEFENDANT'S CITY OF PETTSBURGH AND STATE OF PENNSYLVANIA IS WHERE DEFENDANTS WAS AT ALL RELEVANT TIMES HEREIN A MUNICIPAL CORPORATION OF THE STATE OF PENNSYLVANIA.

8. THIS ACTION ARISES UNDER AND IS BROUGHT PURSUANT TO 42 U.S.C. SECTIONS 1983 TO REMEDY THE DEPRIVATION UNDER COLOR OF STATE LAW OF RIGHTS GUARANTEED BY THE EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION. THIS COURT HAS JURISDICTION OVER THIS ACTION PURSUANT TO 28 U.S.C. SECTION § 1331 AND 1343...

9. PLAINTIFF'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE.

10. THIS CAUSE OF ACTION ARISE IN THE WESTERN DISTRICT OF PENNSYLVANIA. THEREFORE, VENUE IS PROPER UNDER 28 U.S.C. SECTION 1391 (b).

11. PREVIOUS LAWSUITS BY PLAINTIFF

12. THE PLAINTIFF HAS FILED OTHER LAWSUITS DEALING WITHEN THIS SAME FACTS INVOLVED INTO THIS ACTION OR COMPLAINT. OTHERWISE RELATING TO PLAINTIFF JEROME JUNIOR WASHINGTON HVO282, IMPRISONMENT AT SCI-GREENE/175 PROGRESS DRIVE/ WAYNESBURG PA, 15370 CORRECTIONAL INSTITUTIONS. AS FOLLOW

- (A) HAVE YOU FILED OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS YES ☒ NO ☒
- (B) IF YOUR ANSWER TO (A) IS YES, DESCRIBE EACH LAWSUIT BY ANSWERING QUESTIONS 1 THROUGH 7 BELOW. (IF THERE IS MORE THAN ONE LAWSUIT DESCRIBE THE ADDITIONAL LAWSUIT ON ANOTHER SHEET OF PAPER, USING THE SAME FORMAT.)
- 1) PARTIES; TO THE PREVIOUS LAWSUIT;  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANT: CHRIS ROTZCH; et; al;
- 2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; EASTERN DISTRICT COURT.
- 3) DOCKET OR INDEX NUMBER: CIVIL DIVISION NO. 2:14-CV-05561-ER
- 4) NAME OF JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.
- 5) APPROXIMATE DATE OF FILING LAWSUIT
- 6) IS THE CASE STILL PENDING? YES ☒ NO ☒
- 7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ON AN HONORABLE ANSWER OR JUDGMENT OF THE JURISDICTION'S ORDERED ON THE CASE.
- C) 1) PARTIES; TO THE PREVIOUS LAWSUIT  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANT: MICHAEL WENGEROWICZ et; al;
- 2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; EASTERN DISTRICT COURT.
- 3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 15-4102
- 4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO S.
- 5) APPROXIMATE DATE OF FILING LAWSUIT
- 6) IS THE CASE STILL PENDING? YES ☒ NO ☒
- 7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING FOR AN HONORABLE JUDGMENT FOR JUSTICE...
- D) 1) PARTIES; TO THE PREVIOUS LAWSUIT  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANTS: JOHN DOE et; al;
- 2) COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY; EASTERN DISTRICT COURT
- 3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 2:14-CV-05540-ER
- 4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE EDUARDO C. ROBRENO J.
- 5) APPROXIMATE DATE OF FILING LAWSUIT
- 6) IS THE CASE STILL PENDING? YES ☒ NO ☒
- 7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING
- E) 1) PARTIES; TO THE PREVIOUS LAWSUIT  
PLAINTIFF: JEROME JUNG WASHINGTON  
DEFENDANT: TOM WOLF; et; al;
- 2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; WESTERN DISTRICT COURT
- 3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 2:16-CV-01714-LPL
- 4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE MAGISTRATE JUDGE LESA PUPCO LENTHAN.

F) 1) PARTIES: TO PREVIOUS LAWSUIT

PLAINTIFF: JEROME WASHINGTON

DEFENDANTS: Supt. ~~GLUNT~~ GLUNT et. al.

2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT, NAME THE COUNTY; MIDDLE DISTRICT COURT

3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 1:16-CV-1828

4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE JOHN E. JONES III

5) APPROXIMATE DATE OF FILING LAWSUIT?

6) IS THE CASE STILL PENDING? YES ☒ NO ☒

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

G) 1) PARTIES; TO THE PREVIOUS LAWSUIT

PLAINTIFF: JEROME JAMES WASHINGTON

DEFENDANT: SCI-GRATERFORD SUPERINTENDENT MRS. LINK et. al.

2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY; EASTERN DISTRICT COURT

3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 16-3424

4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE LUCY V. CHEN

5) APPROXIMATE DATE OF FILING LAWSUIT?

6) IS THE CASE STILL PENDING? YES ☒ NO ☒

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES  
12) THE PLAINTIFF IS STILL TRYING TO EXHAUST ALL POSSIBLE REMEDIES THAT ARE OFFERED OR THAT IS BEING ALLOWED AS AN INDIGENT PRISONER'S SYS HARD TO GET COPIES FROM SCI-GREENE GRIEVANCE COORDINATOR BEING AN INDIGENT PRISONER LITIGATING PRO-SE HEREIN DETERMINE TO STOP DEFENDANTS CRUEL AND UNUSUAL PUNISHMENT ACTION OF EXCESSIVE FORCE DC-ADMCOI UNDER AN EXCESSIVE AND AGGRESSIVE LONG TERM DISCRETION ISOLATED AND CONFINED IN SHACKLES AND CUFFS BEING ASSAULT HEREIN SCI-GREENE SRTL PROGRAM IS AN UNCONSTITUTIONAL VIOLATION TO POLICY 13.8.1 THAT IS DEFINITELY BEING IGNORE JUST LIKE SCI-GREENE GENERAL ENZO LETTING PRISONER'S GRIEVE THROUGHOUT EXHAUSTION OF REMEDIES AS PRISON GRIEVANCE COORDINATOR AND SECURITY HAD INFORMED PLAINTIFF CLAIM WAS REVIEWED BY THE HIGHEST OFFICIALS OF OSI PRISON AUTHORITIES THROUGHOUT AN EXCESSIVE FORCE DC-ADMCOI ASSAULT CLAIM  
V. CLAIMS OF FACTUAL OBLIGATIONS

13) DEFENDANT C.O. J. JONES ON MARCH 28, 2017 FALSIFICATED THE ELIGIBLE MISCONDUCT DC 034959 REPORT AND CHARGES OF/ OR CLASS 1 & 1 ASSAULT. CLASS 1 & REFUSING TO OBEY AN ORDER OR/ AND DEFENDANT'S C.O. J. JONES STAFF MEMBERS WASHINGTON VERSION: ON THE ABOVE DATE AND TIME THIS OFFICER WAS ASSISTING IN REMAINING INMATE WASHINGTON STATED HE WAS NOT GOING TO LOCK IN HVO 282 FROM GB DAY ROOM BACK TO HIS CELL OF GB01. INMATE WASHINGTON STATED HE WAS NOT GOING TO LOCK IN. THIS OFFICER GAVE INMATE THREE DIRECT VERBAL ORDERS TO STAND UP AND LOCK IN AND TAKE IT IN. INMATE WASHINGTON THEN STOOD UP AND STARTED STRIKING THIS OFFICER IN MY LEFT LEG WITH HIS RIGHT FOOT SEVERAL TIMES. END OF STATEMENT... REFER TO #6 DUE TO ASSAULT ON STAFF. (INCIDENT GB-DAY ROOM); (STAFF INVOLVED OR DATE: 3/28/17); (DATE OF REPORT 3/28/17); (PLACE OF INCIDENT GB-DAY ROOM); (STAFF INVOLVED OR WITNESSES L.T. SCHAMP AND C.O. ADAMSON); (TIME SERVED NOTICE AND DATE: 3/28/17 AT 20:27); (HEARING SCHEDULE; DATE AND TIME 3/30/17 AT 0800...

14) DEFENDANT C.O. J. JONES HAD COMPLETELY SHOWED CRUEL AND UNUSUAL PUNISHMENT UPON THE PLAINTIFF BEING BRUTALLY ASSAULTED BY AT LEAST TEN DIFFERENT STAFF MEMBERS PURSUANT TO THE MALICIOUS AND WILL OF INFAMY AND AGGRESSIVENESS TO THE HAPPENINGS ON 3/28/17 AT AROUND 3:30pm HOURS ON 2 TO 10 SHIFT BY THE INFAMOUS DEFENDANT C.O. J. JONES BRUTALITY JUDGMENT OF/ OR ASSAULT WITHIN DEFENDANT C.O. J. JONES OWN ORDERS OF COMMAND WITHIN AN HIGHER STAFF MEMBER PRESENT OR WITNESSES L.T. SCHAMP ON MISCONDUCT



PAGE 4) DOCUMENTED REPORT C-034959 FOR DEFENDANT C.O. J. JONES AND/OR TO INCLUDE THE PRECISELY CLEARLY Labeled DOCUMENT 1.7. SCHAMP IS ALREADY ELIGIBLY AS AN DEFENDANT INTO CAPTAIN CASE NO. 16-1714-LPL

15) PLAINTIFF HEREBY VERIFY THE FOREGOING SWORN INFORMATION IS THE TRUTH UPON THE UNCONSTITUTIONAL VIOLATIONS FROM DEFENDANT C.O. JONES ON DATE: 3/28/17 AT AROUND 3:30 p.m. ON 2 TO 10 SHIFT HOURS. WERE THE PLAINTIFF WAS SETTING AT THE S.R.T.U-GA TABLE IN FRONT OF GB-01 WITH THE L.T. SCHAMP WHOM WAS TALKING TO THE PLAINTIFF AND ANOTHER INMATE AT THIS TIME UPON DEFENDANT C.O. JONES COMING INTO PLAINTIFF SETTING AREA WITH ANOTHER ESCORTING OFFICER AS GROUP WAS BEING TAKEN IN AT THIS TIME GROUP ACTIVITIES WAS UP. WERE DEFENDANT C.O. JONES HAD ASKED THE PLAINTIFF WAS HE READY TO GO IN. OR OFFER OFFICER HAD TAKEN THE TABLE PLAINTIFF SAID YES AND STOOD UP FROM SETTING WERE BOTH OFFICIALS PRESENT OR OFFICER HAD TAKEN THE TABLE CUFFS OFF OF THE PLAINTIFF BELT CUFF AND TOOK PLAINTIFF OUT OF LEG RESTRAINTS TO THE TABLE SET WERE PLAINTIFF HAD ASKED DEFENDANT C.O. JONES TO REMOVAL THEM DIRTY BOOTS FROM GB-02 CELL DOOR BECAUSE THEY ARE NOT MINE DEFENDANT C.O. JONES SAID NO I AM NOT MOVING THOSE BOOTS FROM YOUR DOOR SO YOU CAN FISH NO THEY ARE STAYING RIGHT THERE AND I'M GOING TO PUT THAT PASTIE THING RIGHT BESIDE YOUR DOOR LIKE YESTERDAY 3/27/17 WITH THOSE DIRTY BOOTS AGAIN SO PLAINTIFF SAID I AM NOT GOING IN MY CELL UNTIL YOU MOVE THOSE DIRTY BOOTS FROM MY DOOR AND/OR PLAINTIFF THAN GRADED THE TABLE POLE AS THE PLAINTIFF HANDS ARE STILL CUFFED UP WITH AN BELT CUFF. AT THE SAME EXACT TIME WHEN DEFENDANT J. JONES HAD SAID YOU ARE GOING IN YOUR CELL ONE WAY OR ANOTHER BY FORCE EVEN IF WE HAVE TO ASSAULT YOU, WERE PLAINTIFF WAS ABOUT TO SIT BACK DOWN IN TO THE TABLE SET. WHEN DEFENDANT HAD AGGRESSIVELY AND EXCESSIVELY CHARGED PLAINTIFF WITHIN INFAMY BRUTAL FORCE WERE TWO OFFICIALS OR MORE HAD SHAMMED THE PLAINTIFF TO THE FLOOR WERE PRISON OFFICIALS WAS COMING FROM OUT OF NOWHERE BRUTALLY, AGGRESSIVELY ASSAULTIVE TO THE PLAINTIFF AS THE PLAINTIFF IS STILL HANDCUFFED UP WITHIN AN BELT AROUND THE PLAINTIFF WAIST LINE TO HOLD THE PLAINTIFF WAS GETTING AGGRESSIVELY BRUTAL MOMENT OF DEFENDANT J. JONES INFAMY WERE THE PLAINTIFF WAS GETTING AGGRESSIVELY MANHANDLE AND ASSAULTED BY AROUND TEN DIFFERENT OFFICIALS ON THE GROUND...

16) DEFENDANT ASSAULTIVE AND BATTERY WAS AT THE TIME PLAINTIFF WAS SUBDUE IN HANDCUFF

17) DEFENDANT ASSAULTED THE PLAINTIFF TRYING TO SET DOWN AT GB UNIT TABLE

18) DEFENDANT ASSAULTED THE PLAINTIFF BY RUSHING THE PLAINTIFF EXCESSIVELY WITHIN TACKLING THE PLAINTIFF BRUTALLY OFF OF THE TABLE STOOL

19) DEFENDANT CONTINUE TO USE HIS WEIGHT AND PHYSICAL FORCE TO PUN THE PLAINTIFF DOWN TO THE FLOOR.

20) DEFENDANT BRUTAL FORCE TO PLAINTIFF BODY LEFT PLAINTIFF BLEEDING ANALLY ON 3/28/17

21) DEFENDANT EXCESSIVENESS RUSHED PLAINTIFF LEP ON 3/28/17

22) DEFENDANT AGGRESSIVENESS WITHIN PLAINTIFF'S SUBDUE IN CUFFS LEFT MARKS ALL OVER THE PLAINTIFF HANDS WHICH BECAME BRUISED AND SWOLLEN

23) DEFENDANT J. JONES HAD ASSAULTED THE PLAINTIFF ON 3/28/17 AROUND 3:30 p.m. ON 2 TO 10 SHIFT WERE THE PLAINTIFF WAS THAN TAKEN TO SEE MEDICAL THE MEDICAL NURSES WHICH WAS TWO FEMALE NURSES PRESENT BUT BEFORE THE NURSES ARRIVED THE PLAINTIFF WAS VERY UPSET AND/OR HAD BEEN HUMILIATED AND EMBARRASSED BY DEFENDANT J. JONES ASSAULT AND BATTERY THAT HAD MADE THE PLAINTIFF EMOTIONALLY MAD AND ANGRY BECAUSE OF DEFENDANT J. JONES WRONGFULLY BRUTALLY BEATEN THE PLAINTIFF TO HAVE A BUSTED LEP WERE BLOOD WAS ON THE PLAINTIFF HANDS FROM PLAINTIFF LEP BLEEDING AND SWOLLEN ON CHAIR RESTS WHICH WERE PLAINTIFF AFTER PLAINTIFF WAS EMBARRASSED IN FRONT OF ALL THE S.R.T.U-GA UNIT INMATES WERE THE PLAINTIFF HAD SAID ON CAMERA OUT OF FRUSTRATION AND ANGER UPON PLAINTIFF SAYING THAT IF I SEE THAT OFFICER AGAIN I AM GOING TO KILL HIM THAT OFFICER BATTER NOT NEVER BE AROUND NIE. PLUS MORE VERBAL ABUSIVE WORDS OUT OF FRUSTRATION DEPRESSION FOR THE WORLD'S USED AFTER BEING MENTALLY, PHYSICALLY AND EMOTIONALLY DAMAGE BY DEFENDANT EXCESSIVELY ASSAULTED AND AGGRESSIVELY HANDCUFFED UP WITHOUT AND CAMERA BEING PRESENT AT THE CRITICALLY IRRATIONAL OFFICIAL BRUTALITY OUT OF RETALIATION OR HATRED MALICIOUS ILL WILL FOR AN UNCONSTITUTIONAL VIOLATIONS...

24) DEFENDANT C.O. JONES KEEP ON JUMPING DOWNWARD WITH HIS WEIGHT DOWN ON THE PLAINTIFF BODY WHICH THE PLAINTIFF IS CUFFED UP PEND TO THE GROUP

25) DEFENDANT C.O. JONES WAS ENFORCED TO LEAVE OFF OF GB UNIT FOR HIS ACTIONS; NOT JUST ONE BUT TWICE TOLD TO LEAVE OFF OF GB UNIT BY L.T. SCHAMP AS DEFENDANT C.O. JONES HAD CONTINUOUSLY TRYED TO COME BACK ON GB UNIT TO FINISH OFF THE ASSAULT THAT HE'VE STARTED

26) DEFENDANT J. JONES TOOK IT UPON HIMSELF TO RUSH AND SHAM ME TO THE GROUP WHY!! PLAINTIFF WAS

27) AT ALL RELEVANT TIMES DEFENDANT Supt. GILMORE WAS AND IS HELD ACCOUNTABLE FOR THE OVERALL CUSTODY CONTROL AND PROTECTION OF PRISONERS AND PRISON OFFICIALS SAFETY AND CARE ADMINISTRATIVE PROTECTION AND SHARE AN EQUAL PART OF HIS OFFICIALS VIOLATION UNDER THE PRACTICES POLICIES DC-ADM 001 ASSAULT PROCEDURAL LAWS UNDER GILMORE ACKNOWLEDGEMENT OR KNOWINGS OF ACTUAL EVENTS LIKE MARCH 28, 2017 BUT IGNORE BY TURN INTO THE OPPOSITE DIRECTION WITHIN AN EYE TO ASSUMPTION IT IS OKAY TO VIOLATED PLAINTIFF 8th AND 14th AMENDMENT RIGHTS TO THE CONSTITUTIONAL LAWS OF PRISONERS RIGHTS ON 3/28/17 HEREIN, DEFENDANT WERE "PERSON" FOR PURPOSES OF 42 USC, SECTION § 1983 AND ACTED UNDER COLOR OF LAW DEPRIVE PLAINTIFF OF THEIR CONSTITUTIONAL RIGHTS, AS SET FORTH MORE FULLY ABOVE.

### VI. RELIEF AND INJUNCTION

- 28) RELIEF AND INJUNCTION NO. MORE PRISON OFFICIALS ASSAULTIVE AND BATTERY ACTIONS WHY PRISONERS ARE HANDCUFFED UP AND SHAWED
- 29) RELIEF AND INJUNCTION FOR THE BURDEN OF PAIN CAUSED FROM ASSAULTIVE OFFICIALS TO THE MENTAL HEALTH PATIENTS SHOULD SHOW CAUSE FOR AN INJUNCTION SANCTION ON THEIR DUTY AND COST OF BURDEN TO THEIR EMPLOYMENT STATUS AND ASSUMPTION
- 30) RELIEF AND INJUNCTION FOR MENTAL HEALTH PRISON OFFICIALS TO HAVE AN LESS SANCTUARY ON THE USE OF CUFFS AND SHACKLES UPON MENTAL HEALTH DECLINING GROUP AND LESS DISCRETION ON INMATES PLACEMENT.
- VII. RELIEF FACTUAL COMPENSATIONS

- 31) DEFENDANT Supt. GILMORE IS SUED IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLARS UNDER THE VIOLATION OF PLAINTIFF 8th AND 14th AMENDMENTS RIGHTS.
- 32) DEFENDANT Supt. GILMORE IS HELD AT SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG PA 15370 NUMBER 724.852.2902/WWW.COR.STATE.PA.US/DEFENDANT IS SUPERINTENDENT/WARDEN OF SCI-GREENE CORRECTIONAL INSTITUTIONS.
- 33) DEFENDANT C.O. J. JONES IS SUED IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLARS UNDER THE VIOLATION OF PLAINTIFF 8th AND 14th AMENDMENTS RIGHTS.
- 34) DEFENDANT C.O. J. JONES IS AT ADDRESS SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG PA 15370 NUMBER 724.852.2902/WWW.COR.STATE.PA.US/DEFENDANT IS ~~SUP~~ A CORRECTIONAL OFFICER AT SCI-GREENE

### VIII. RELIEF CLAIMS

- 35) PLAINTIFF INCORPORATES BY REFERENCE PARAGRAPHS 1 THROUGH 34. OF THIS COMPLAINT
- 36) THE PLAINTIFF EIGHTH AMENDMENTS, AS APPLIED TO THE STATES BY THE FOURTEENTH AMENDMENT, PROHIBITS CRUEL AND UNUSUAL PUNISHMENT.
- 37) DEFENDANT'S POLICIES, PRACTICES AND PROCEDURES SYSTEMICALLY VIOLATE THE EIGHTH AMENDMENT RIGHTS OF PRISONERS WITH MENTAL ILLNESS. SUCH POLICIES PRACTICES AND PROCEDURES INCLUDE, EXCESSIVE FORCE DC-ADM 001 ASSAULTIVE AND BATTERY, WITHOUT LIMITATION IN THE SRTU PROGRAM.
- 38) CONFINEMENT OF PRISONERS IN SCI-GREENE SRTU-PROGRAM WITH SMI/AD MENTAL ILL PATIENTS IS ENFORCED TO A LONG TERM OF EXCESSIVE FORCE AND AGGRESSIVE DISCRETION EXCESSIVELY ENFORCED TO WORSEN THE CONDUCT AND CONVICTION OF INMATES WITH SMI/AD AS SCI-GREENE SRTU PROGRAM IS WORSE THAN CONFINEMENT IN A R.H.U. FOR THE CONDUCT TO BE DIRECTLY ATTRIBUTABLE TO DISTRACT AND DESTROY PLAINTIFF MENTAL ILLNESSES.
- 39) RELIEF FROM STAFF MEMBERS TO ASSESS AND GUIDE PATIENTS WITH THE SERIOUS MENTAL HEALTH HELP NEEDED TO BE ADEQUATELY PROVIDED.
- 40) RELIEF PUNITIVE DAMAGES; NORMAL DAMAGES AND EVERY OTHER SUITABLE AND APPROPRIATE RELIEF THERE AS TO OFFER.
- 41) RELIEF CIVIL AND REHABILITATIVE STAFF UNDER MENTAL HEALTH TREATMENT AND CARE PROVIDED
- 42) A PLAINTIFF BEING UNDER 1983 MUST ALLEGE TWO "ELEMENTS" THAT SOME PRISONER HAS DEPRIVED PLAINTIFF OF A "FEDERAL RIGHTS" AND THAT THE PERSON WHO HAS DEPRIVED HIM OF THAT RIGHT ACTED UNDER COLOR OF STATE OR TERRITORIAL LAW. AS SO PLAINTIFF IS PROSE LITIGANT UNDER THE UNITED STATES DECLARED PENALTY OF PERJURY

SCIENCE WASHINGTON #V0082  
SCI-GREENE  
175 PROGRESS DRIVE  
WAYNESBURG PA 15370  
DATE MARCH 8, 2018  
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